

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, JOHN DOE, JANE DOE 1, JANE
DOE 2, and JANE DOE 3,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

MOTION FOR *PRO HAC VICE* ADMISSION OF KAREN L. DUNN

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding, hereby move the Court for the admission of

Karen L. Dunn, Esquire to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Ms. Dunn is a partner with Boies Schiller Flexner LLP, 1401 New York Avenue, NW, Washington, DC 20005, Tel: (202) 237-2727, Fax: (202) 237-6131, Email: kdunn@bsflp.com.

2. Ms. Dunn is qualified and licensed to practice law and is a bar member in good standing in the State of New York (Registration No. 4498028 – since April 19, 2007) and the District of Columbia (Bar ID No. 1002520 – since July 8, 2011).

3. Ms. Dunn agrees to submit to and comply with the appropriate rules of procedure as required in the case for which she is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Karen L. Dunn, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: November 6, 2017

Respectfully submitted,

s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

COOLEY LLP

11951 Freedom Drive, 14th Floor

Reston, VA 20190-5656

Telephone: (703) 456-8000

Fax: (703) 456-8100

Email: rcahill@cooley.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I hereby certify, on this same date, that I have also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Nathan Damigo
14773 Orange Blossom Rd
Oakdale, CA 95361

Matthew Parrott
a/k/a David Matthew Parrott
950 S. Ridgecrest Lane
Paoli, IN 47454

Jeff Schoep
Nationalist Front f/k/a Aryan National Alliance
National Socialist Movement
22803 Rausch Avenue
Eastpointe, MI 48021

Michael Hill a/k/a James Michael Hill
146 Bridgewood Drive
Killen, AL 35645

Loyal White Knights of the Ku Klux Klan
a/k/a Loyal White Knights Church of Invisible Empire Inc.
c/o Registered Agent United States Corporation Agents, Inc.
6135 Park South Drive
Charlotte, NC 28210

Michael Peinovich
a/k/a Michael "Enoch" Peinovich
519 E. 82nd Street, Apt 2C
New York, NY 10028

Michael Tubbs
League of the South
524 Cole Road W
Jacksonville, FL 32218

James Alex Fields, Jr. - inmate
(Offender ID no. 1913360)
Albemarle-Charlottesville Regional Jail
160 Peregory Lane
Charlottesville, VA 22902

Christopher Cantwell – inmate
(Offender ID no. 1915204)
Albemarle-Charlottesville Regional Jail
160 Peregory Lane
Charlottesville, VA 22902

Identity Europa, Inc.
a/k/a Identity Evropa
c/o Registered Agent LegalZoom.com, Inc.
101 N. Brand Blvd, 11th Floor
Glendale, CA 91203

Elliot Kline
a/k/a Eli Mosely and/or Eli Mosley
117 Mesa Drive
Reading, PA 19608

Robert Ray
(a/k/a Robert "Azzmador" Ray and Robert Warren Ray)
22345 Cherry Lane
Frankston, Texas 75763

Traditionalist Worker Party
Registered agent: Thomas Buhls
2517 Federal Road
Benson, North Carolina 27504

s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)
COOLEY LLP
11951 Freedom Drive, 14th Floor
Reston, VA 20190-5656
Telephone: (703) 456-8000
Fax: (703) 456-8100
Email: rcahill@cooley.com

Counsel for Plaintiffs